United States Environmental Protection Agency
Region V
POLLUTION REPORT

Date: Friday, May 02, 2008
From: Tom Cook, OSC

To:
John Maritote, U.S. EPA ERB
David Chung, U.S. EPA
Afif Marouf, U.S. EPA
Mike Harris, U.S. EPA
Peter Felitti , U.S. EPA
Mick Hans, U.S. EPA
Linda Nachowicz, U.S. EPA
Bruce Everetts, IEPA
Rosauro Delrosario, U.S. EPA
Valerie Mullins , U.S. EPA

Subject: Peoples Gas Hough Place Station Site
2500 South Corbett Street, Chicago, IL
Latitude: 41.8469
Longitude: -87.6503

POLREP No.:	15	**Site #:**	B5HH
Reporting Period:	3/14/08 to 4/18/08	**D.O. #:**	Not Applicable
Start Date:	6/18/2007	**Response Authority:**	CERCLA
Mob Date:	6/18/2007	**Response Type:**	Time-Critical
Completion Date:		**NPL Status:**	Non NPL
CERCLIS ID #:	ILN000510190	**Incident Category:**	Removal Action
RCRIS ID #:		**Contract #**	EP-S5-06-04

Site Description

The Hough Place Station Site (Site) is located at 2500 South Corbett Street, Chicago, Cook County, Illinois, in a mixed residential, commercial, and industrial area. The site is approximately 4.5 acres and is bordered to the north by the South Branch of the Chicago River, to the east by a paper storage and distribution facility, to the south by railroad property, and to the west by vacant property. The vacant property to the west and the Site are currently owned by Crowley□s Yacht Yard, which previously operated a sailboat storage, sales, and repair facility at the Site.

The Site is a former manufactured gas plant (MGP) that operated as an MGP facility from approximately 1886 to 1934. The Site was built in 1985 by the Equitable Gas Light and Fuel Company and in 1892 began producing □Pintsch gas,□ a relatively high quality gas produced by an oil gas process, for the Pintsch Compressing Company. Production of Pintsch gas occurred until about the early 1920s. In 1897 Peoples Gas acquired the facility and dismantled the station in 1934. Portions of the property were subsequently leased to other companies who used the property for storage of building materials and the production of asphalt, concrete, and other paving materials until approximately 1950. In 1953, Chicago Title and Trust Company took possession of the property as trustee. From approximately

1953 to 1978, the J.M. Corbett Company operated an asphalt mixing plant on the property. In 1978, Crowley□s Yacht Yard bought the property.

From 2000 to November 2006, several investigations were conducted by Peoples Gas at the Site. These investigations included the excavation of test pits, the installation of shallow monitoring wells, the collection of soil borings, the collection of soil and groundwater samples, a geotechnical investigation, and borings into river sediments. Test pits revealed staining and odors, and black asphalt tar at 2 feet below ground surface (bgs). Benzene, toluene, ethylbenzene, and xylene (BTEX); polynuclear aromatic hydrocarbons (PAH); metals, and cyanide were detected in several surface and subsurface soil samples. BTEX, PAHs, and metals were also detected in groundwater samples collected at the Site. Soil borings indicated tar at levels below the water level in the filled-in boat slip. The river investigation revealed sheens, odors, tar coated/stained material, and traces of tar in some of the sediment borings.

Remediation activities by Peoples Gas began in November 2006 under the Illinois Environmental Protection Agency (IEPA) Site Remediation Program. Peoples Gas is the potentially responsible party (PRP) for the site. People□s Gas contracted Burns & McDonnell Engineering Company, Inc. (BMcD) to remediate the Site, along with their subcontractors.

Remediation consists of excavation and disposal of contaminated soils. Excavation depths range from approximately 3 feet to 24 feet bgs. Other site activities conducted by the PRP include daily air monitoring, continuous 24-hour perimeter air monitoring and sampling, confirmation soil sampling, and water treatment, sampling, and discharge.

Prior to the U.S. EPA oversight at the Site, BMcD completed excavation of impacted material in excavation cells CF01 to CF58 (see BMcD map of excavation areas under □documents□ on the OSC website). An Administrative Order on Consent was signed by Peoples Gas in early June 2007, prompting the U.S. Environmental Protection Agency (U.S. EPA) to begin PRP oversight activities at the Site.

On June 12, 2007, a kick-off meeting was held at the 22nd Street Site between U.S. EPA, START, Peoples Gas, and BMcD, to discuss future oversight activities, documents required, and logistics for transmitting data and documents. The meeting addressed three MGP sites that U.S. EPA would be overseeing, all located within one mile of each other: 22nd Street Station, Hough Place, and Pitney Court. Note that one START member covers oversight of these three sites, splitting time between each of the three sites. Both Hough Place and Pitney Court remediations are expected to be completed by the middle of 2008, while the 22nd Street Station Site remediation is expected to be completed by March 2009.

On June 18, 2007, U.S. EPA began PRP oversight activities at the three Peoples Gas MGP sites: Hough Place Station, Pitney Court, and 22nd Street Station. The U.S. EPA Superfund Technical and Response Team (START) contractor is performing PRP oversight during the removal activities at the sites.

As part of the removal activities, START collects or observes the collection of soil confirmation samples to confirm that the PRP cleanup objectives are being met. Site contaminants of concern are:

- BTEX;
- PAHs;
- Synthetic precipitation leaching procedure (SPLP) lead, chromium, and selenium.

Cleanup objectives for the Hough Place Station Site are as follows:
1. Remove all source material.
2. For the 0 to 3.5 foot depth interval, remove all soil that exceeds IEPA TACO Tier 1 residential standards for soil ingestion and install a 3 foot engineered barrier.
3. For the 0 to 10 foot depth interval, remove all soil that exceeds IEPA TACO Tier 1 residential standards for soil inhalation and where necessary, install a 10 foot engineered barrier to prevent exposure via inhalation.
4. Invoke a construction worker notice and the City of Chicago Ordinance prohibiting installation of potable wells on the Site to eliminate the construction worker and groundwater exposure pathways.

In August 2007, Metropolitan Water Reclamation District of Greater Chicago (MWRD) finalized the discharge permit that authorizes treatment and discharge of treated Site water to an onsite MWRD sanitary sewer. START collects or observes the collection of treatment water samples to confirm that the MWRD objectives are being met. Samples are being collected to identify the potential presence of the following site contaminants of concern:

- Target Compound List (TCL) VOC;
- PAH; and
- Target Analyte List (TAL) Metals.

Treated water objectives for the Site are established by MWRD in the discharge permit issued for the site.

Current Activities

During the reporting period, the PRP excavated cells 103 (30 ft cofferdam), 104 (16 ft cofferdam), 105, 106 (west river bank), 107 and 108 (north of 16 ft cofferdam), 90, 91, 110 and 115 (Evans Slip), 97 (Hough Slip) and 116 (east river bank) and the MWRD island. The PRP conducted confirmation soil sampling of excavation cells 090, 091, 097, 103, 104, 105, 106, 107, 108, 110, 112, 113, 114, 115, and the MWRD well area (TP 61, 109, 058, 111, and 106). The PRP subcontractor North Star continued installing the earth retention system (cofferdams). The PRP removed river erosion mat and installed a silt curt along the site□s north boundary.

A summary of the remediation activities performed during the reporting period are as follows:

- Transported 564 loads to CID Landfill in Calumet City, Illinois; trucks decontaminated

prior to leaving site.

- Performed perimeter air sampling and air monitoring on a continuous basis (24-hour air samples and air monitoring is conducted around the perimeter). On March 18-19 and 31, and April 2, 8, 15, 17-18, 2008, elevated dust in air levels was detected: re-sample was below action levels or dust control measures were used. On March 27-28, and April 10, 2008, elevated benzene in air levels was detected: re-sample was below action levels or benzene control measures were taken.
- Performed health and safety air monitoring during site activities.
- Performed street sweeping activities in front of the Site and along Senour Street, weather permitting.
- Performed daily de-watering activities in excavation areas. Performed water treatment and discharged 1,560,770 gallons of treated water to the MWRD system.
- Transported 53 loads of impacted water to the Ortek facility in McCook, Illinois
- Collected confirmation soil samples and monthly MWRD discharge water samples
- Backfilled completed excavation cells.

On March 21, 2008, BMcD collected the monthly MWRD treated water discharge sample. The sample was analyzed for the SDA-002 parameters specified in the MWRD discharge permit. START is awaiting sample results from BMcD.

On March 26, 2008, BMcD collected one soil sample each from the floor of excavation cells 105 and 106. The samples were analyzed for BTEX and PAHs. The sample results met the PRP objectives as stated in the Remedial Action Plan (RAP).

On March 28, 2008, BMcD collected one soil sample each from the floor of excavation cells 104, 107 and 108. The samples were analyzed for BTEX and PAHs. The sample results met the PRP objectives as stated in the RAP.

On April 1, 2008, BMcD collected one soil sample each from the floor and west wall of excavation cells 90 and 91. An odor was detected that did not appear to be similar to MGP contamination. The PRP analyzed soil from the cells for additional parameters. The floor samples were analyzed for TCL VOCs, TCL SVOCs, PCBs, TCLP RCRA metals, pH, and fraction of organic content. There were no detections of VOCs or PCBs in the floor samples. The wall samples were analyzed for BTEX and PAHs. The floor and wall sample results met the PRP objectives as stated in the RAP.

On April 2, 2008, BMcD collected one soil sample each from the floor and west wall of excavation cell 110. The floor sample was analyzed for TCL VOCs, TCL SVOCs, PCBs, TCLP RCRA metals, pH, and fraction of organic content. The wall sample was analyzed for BTEX and PAHs. There were no detections of PCBs in the floor sample. The floor sample had PAH results that exceeded TACO residential SROs for ingestion. Therefore, the area will be designated as an engineered barrier. The floor and wall sample results met the PRP objectives as stated in the RAP.

On April 2, 2008, BMcD also collected one soil sample each from the "MWRD island" near the MWRD well onsite. These samples were taken from the floor of cell 109, the east

wall of cell 106, and the west wall of cell 111. The samples were analyzed for BTEX and PAHs. The sample results met the PRP objectives as stated in the RAP.

The Centerpoint-owned portion of the slip is being remediated under an agreement between the PRP and Centerpoint. Only the Crowley-owned portion (west half) of the slip is covered by the AOC. The 0□3.5 ft bgs horizon of the east wall of Hough Slip is not being sampled because the PRP investigations indicate that no MGP-related contamination is expected in the fill material that comprises the surface of the slip. The samples are being analyzed for BTEX and PAHs.

On April 4, 2008, BMcD collected one soil sample from the north wall of excavation cell 97, depth 3.5 □ 10 ft bgs (Crowley portion of Hough Slip). The sample was analyzed for BTEX and PAHs. The sample had PAH results that exceeded TACO residential SROs for ingestion. Therefore, the area will be designated as an engineered barrier. The sample results met the PRP objectives as stated in the RAP.

On April 7, 2008, BMcD collected one soil sample from the floor of excavation cell 112 in Hough Slip, depth 3.5 ft bgs. The sample was analyzed for BTEX, PAHs and SPLP metals. The sample had PAH results that exceeded TACO residential SROs for ingestion. Therefore, the area will be designated as an engineered barrier. The sample results met the PRP objectives as stated in the RAP. START is still waiting for the sample results for the SPLP metals.

On April 11, 2008, BMcD collected one soil sample each from the floor of excavation cells 103 and 113. The samples were analyzed for BTEX and PAHs. The sample results met the PRP objectives as stated in the RAP.

On April 15, 2008, BMcD collected one soil sample from the floor of excavation cell 114. The samples were analyzed for BTEX and PAHs. START is waiting for the sample results.

On April 16, 2008, BMcD collected one soil sample each from the floor and west wall of excavation cell 115. The samples were analyzed for BTEX and PAHs. START is waiting for the sample results.

Analytical results for previous sampling events were received and evaluated by START.

On February 25, 2008, BMcD collected the monthly MWRD treated water discharge sample. The sample was analyzed for the SDA-002 parameters specified in the MWRD discharge permit. The sample results met the discharge limits as stated in the MWRD permit.

On February 27, 2008, BMcD collected two soil samples each from the north and east walls of excavation cell 098, depth 3.5 □ 10 ft bgs and 10 □ 18 ft bgs, (Centerpoint portion of Hough Slip). The sample was analyzed for BTEX and PAHs. The sample results met the PRP objectives as stated in the RAP.

On March 7, 2008, BMcD collected one soil sample each from the floor, north and east walls of excavation cell 102, depth 3.5 □ 12 ft bgs (Centerpoint portion of Hough Slip). The sample was analyzed for BTEX and PAHs. The sample results met the PRP objectives as stated in the RAP.

Planned Removal Actions
Planned removal actions at the Hough Place Station Site are as follows:

- □ Excavate soil per the RAP
- □ Transport excavated soil to CID Landfill for disposal
- □ De-water excavation areas
- □ Treat and dispose water onsite to the MWRD system, or dispose offsite at CID or Ortek
- □ Backfill completed excavation areas

Next Steps
The next steps to be carried out by the PRP are as follows:

- □ Complete excavation of cell 116; including disposal of soil
- □ Begin excavation of cell 117
- □ Continue to de-water excavation areas as required
- □ Treat water and discharge to MWRD system or dispose offsite
- □ Continue dust control activities
- □ Continue 24-hour perimeter air monitoring and sampling
- □ Continue air monitoring in work zones
- □ Continue street sweeping activities
- □ Continue to decontaminate trucks prior to trucks leaving site
- □ Collect confirmation samples of cell 116, when completed
- □ Backfill completed excavation cells with clean fill when confirmation results are received

Key Issues
None.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
RST/START	$80,000.00	$58,814.00	$21,186.00	26.48%
Intramural Costs				
Total Site Costs	$80,000.00	$58,814.00	$21,186.00	26.48%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

Disposition of Wastes

Waste Stream	Quantity	Manifest #	Disposal Facility
December 2007 Non-hazardous Soil	4920 yd3		CID
December 2007 Non-hazardous Liquid	30500 gallons		Ortek
January 2008 Non-hazardous Soil	7935 yd3		CID
February 2008 Non-hazardous Soil	5490 yd3		CID

www.epaosc.net/HoughPlace